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With CARB's proposed amendment to the regulation, to "defer compliance with the PM filter requirements for up to 3 vehicles for any owner that cannot get financing to comply", Ironman respectfully asks CARB to further clarify this process in the regulation.

For example, if a truck owner seeks an extension because he has been denied financing for a new truck purchase, will CARB require that they also seek retrofit financing as an alternative option before granting the extension? The current amendment proposal does not clarify what the truck owner is required to show in order to prove that all financing options have been exhausted. CARB can make more specific clarifications in the updated regulation to ensure that truck owners have truly gone through every possible channel before seeking the extension.

If a truck owner does in fact get declined for retrofit financing and CARB is able to verify this and approve the extension, Ironman further recommends that these truck owners must at least ensure that their engines are in reasonable working order. It is our experience that 33% of engines fail the engine PIC requirements for retrofit standards – and are polluting at a much higher level than CARB currently projects.

To receive and/or maintain the extension, the truck owner must show that the engine meets CARB engine PIC requirements to ensure that basic engine maintenance is achieved:

- No active emission engine fault codes (ECU download)
- Opacity must be below 20%
- Fuel and oil inspected for contamination
- No visible oil leaks
- Charge air cooler is clean

Ironman emphasizes to CARB that any extension provided should not allow dirty engines to continue operating on the road and destroy the good work that all the other retrofitted and new engines are achieving in reducing harmful California emissions.

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